

Law Offices of Robert Manchel
Executive Center of Greentree
One Eves Drive, Suite 111
Marlton, New Jersey 08053
(856)797-1500
Robert Manchel
RM 1141
Attorney For Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: Shaun J. Reiss : CASE NO. 18-25819MBK
: CHAPTER 13

Debtor's response to the Trustee's Objection to Confirmation.

I, Debtor, Shaun J. Reiss, under penalties of perjury, certify and state the following:

1. My wife's pay stubs and my pay stubs are accurately reflected on schedule I, of my bankruptcy petition. My wife and I are paid on a biweekly basis. My bankruptcy schedules "I" and "J" accurately reflect my household income and expenses.
2. Per In Re: Hamilton v. Lanning, 130 S.Ct. 2464 (2010), there is a substantial change in circumstances and the disposable income should be determined by schedules I and J and not the Chapter 13 Statement of Current Monthly Income and Calculation of Commitment Period. The "Means Test" shows annual gross income of \$222,949.80 which is an inaccurate reflection of my income. I changed jobs and began a new position in May 2018.
3. My present employer commenced deducting for medical, dental, vision and life insurance on my pay statement of June 14, 2018.
4. I received a one-time sign on bonus and will not receive any bonuses in the future.
5. My wife pays \$1,265 per month on her monthly debt. Proof of this monthly debt has been submitted to the trustee.
6. My sons, ages 11 and 13 years, are being treated by an orthodontist and I pay an average monthly fee of \$250 for braces and treatment. Proof of the monthly expense for the orthodontist has been submitted to the trustee.

7. My son who is 13 years old was recently diagnosed with Celiac Disease and a potential allergy to the disease. He has begun extensive testing and treatment which will continue indefinitely. On average I pay approximately \$450 or more per month for out of pocket medical and dental expenses for my five (5) children, myself and wife. Proof of my medical and dental expenses has been submitted to the trustee.

I, Shaun J. Reiss, certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: _____

Respectfully submitted,
/s/ Shaun J. Reiss, debtor
Shaun J. Reiss